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8 CRISTINA SEPE, WSBA #23609  
9 *(application for admission forthcoming)*  
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12 TERA M. HEINTZ, WSBA #54921  
13 *(application for admission forthcoming)*  
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15 *(application for admission forthcoming)*  
16 *Deputy Solicitors General*  
17 800 Fifth Avenue, Suite 2000  
18 Seattle, WA 98104  
19 (206) 464-7744

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT YAKIMA**

STATE OF WASHINGTON, et al.,

NO. 20-cv-3127-SAB

## Plaintiffs,

APPLICATION FOR LEAVE TO  
APPEAR PRO HAC VICE

DONALD J. TRUMP et al.

Fee: \$200.00

## Defendants

Pursuant to LCR 83.2(e) of the United States District Court for the Eastern District of Washington, Michelle S. Kallen hereby applies for permission to appear and participate as counsel in the above-entitled action on behalf of the

1 Commonwealth of Virginia.

2 The particular need for my appearance and participation is: to ensure  
3 adequate representation of the interests of the Commonwealth of Virginia.

4 I, Michelle S. Kallen, understand that I am charged with knowing and  
5 complying with all applicable local rules.

6 I have been admitted to practice before the following courts on the  
7 following dates:

Courts	Dates
California	11/23/2010
District of Columbia	2/8/2016
Virginia	9/13/2018

12 I have not been disbarred or formally censured by a court of record or by  
13 a state bar association and there are not disciplinary proceedings against me.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Date: August 20, 2020 Signature of Applicant: /s/ Michelle S. Kallen

16 Pro Hac Vice Attorney

17 Applicant's Name:

Michelle S. Kallen

18 Bar No./State Bar No.:

VSB #94542

19 Law Firm Name:

Office of the Attorney General of Virginia

20 Street Address:

202 North 9<sup>th</sup> Street

21 City, State, Zip:

Richmond, VA 23219

22 Phone number:

(804) 786-7704

Primary Email:

mkallen@oag.state.va.us

## STATEMENT OF LOCAL COUNSEL

I am authorized and will be prepared to handle this matter, including trial, in the event the applicant Michelle S. Kallen is unable to be present upon any date assigned by the court.

DATE: 8/20/2020 Signature of Local Counsel: /s/Kristin Beneski

Local Counsel's Name: Kristin Beneski

Bar # / State Bar #: WSBA #45478

Law Firm Name: Washington Office of the Attorney General

Street Address: 800 Fifth Avenue, Suite 2000

Street Address: 300 First Avenue, S  
City, State, Zip: Seattle, WA 98104

City, State, Zip: Seattle, WA 98133  
Phone/Faxsimile: 206-464-7459

Phone/Fax/Fax/Fax: 200-461-7459  
Primary Email: Kristin.Beneski@...

Primary Email: Kristin.Beneski@ag.wa.gov

## Electronic Case Filing Agreement

By submitting this form, the undersigned understands and agrees to the following:

1. The CM/ECF system is to be used for filing and reviewing electronic documents, docket sheets, and notices.

2. The password issued to you by the court, combined with your login, serves as your signature under Federal Rule of Civil Procedure 11. Therefore, you are responsible for protecting and securing this password against unauthorized use.

3. If you have any reason to suspect that your password has been compromised in any way, you are responsible for immediately notifying the Court. Members of the Court's systems staff will assess the risk and advise you accordingly.

4. By signing this Registration Form, you consent to receive notice electronically, and to waive your right to receive notice by personal service or first class mail pursuant to Federal Rule of Civil procedure 5(b)(2)(c), except with regard to service of a complaint and summons. This provision does include electronic notice of the entry of an order or judgment.

5. You will continue to access court information via the Eastern District of Washington's internet site or through the Public Access to Court Electronic Records (PACER) system. You will continue to need a PACER login, in addition to the Court-issued password. You can register for PACER at their web site: <http://pacer.psc.uscourts.gov>.

6. By this registration, the undersigned agrees to abide by the rules and regulations in the most recent General Order, the Electronic Filing Procedures developed by the Clerk's Office, and any changes or additions that may be made to such administrative procedures in the future.

/s/ Michelle S. Kallen  
Signature

August 20, 2020  
Date Signed

## **DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 24th day of August, 2020, at Tumwater, Washington.

/s/ Jennifer D. Williams  
JENNIFER D. WILLIAMS  
Paralegal